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Alessandra Stivelman, Esq. via email to: astivelman@eisingerlaw.com
Eisinger Law
4000 Hollywood Blvd., Ste 265-S
Hollywood, FL 33201

RE: San Remo Golf & Tennis Club Condominium Association Inc.'s Denial of Cynthia Buckley's Request for Accommodation

Dear Ms. Stivelman:

I hope this correspondence finds you well. I have been retained by Cynthia Buckley to address the denial of her request for accommodation for an emotional support animal. As you are aware, on May 25, 2023, my client requested that San Remo Golf & Tennis Club Condominium Association Inc. waive its pet restriction as an accommodation of her disability.

It would appear that San Remo Golf & Tennis Club Condominium Association Inc. has already violated the Fair Housing Act in multiple ways. First, by discussing Ms. Buckley's request for accommodation with my client's "fellow neighbors" her rights of privacy have been violated. Ms. Buckley's disability-related request for accommodation should never have been discussed with anyone except those directly involved in considering her accommodation request.

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Second, if San Remo Golf & Tennis Club Condominium Association Inc. was skeptical of the legitimacy of Ms. Buckley's disability or need for an accommodation, it was obligated to request additional documentation or open a dialogue rather than immediately refusing the requested accommodation. *Bhogaita v. Altamonte Heights Condo. Ass'n*, 765 F.3d 1277, 1287 (11th Cir. 2014), citing *Jankowski Lee & Associates v. Cisneros*, 91 F.3d 891, 895 (7th Cir. 1996).

Finally, in addition to flatly denying Ms. Buckley's requested accommodation, the Association caused a threatening letter to be sent to Ms. Buckley warning "that the law also states that there can be criminal penalties if a person falsifies information or documents, or knowingly provides fraudulent information or documents, to support an emotional support animal request, or who otherwise knowingly and willfully misrepresents their disability status or needs, commits a misdemeanor offense in the second degree." (emphasis in the original) The Association cannot prosecute a person for a crime and had no obligation to provide Ms. Buckley legal advice. The Association's gratuitous legal advice along with the demand that she immediately remove her emotional support animal or face "fines, penalties, and/or legal proceedings" are clearly an illegal attempt to intimidate Ms. Buckley into not pursuing her fair housing rights.

Your letter incorrectly insinuates that Ms. Buckley has proffered a letter she purchased from the internet. To the contrary, she has been treating with Dorit Morecraft for a year and a half. The letter written by Ms. Morecraft verifies that Ms. Buckley has a condition that "substantially limits several major life activities," and explains how living with Winnie helps ameliorate the symptoms of Ms. Buckley's disability. Accordingly, San Remo Golf & Tennis Club Condominium Association Inc. has been provided more than sufficient information regarding Ms. Buckley's need for an accommodation and I look forward to prompt confirmation that any restrictions that would prevent Ms. Buckley from living with her dog Winnie for emotional support animal will be waived for as long as Ms. Buckley is a resident of San Remo Golf & Tennis Club Condominium Association Inc. If such confirmation has not been provided by June 28, 2023, I will take legal action on Ms. Buckley's behalf.

Regards,

/s/Marcy I. LaHart

Marcy I LaHart, Esq.